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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND
DIVISION

JANE ROE, an individual; MARY ROE,
an individual; SUSAN ROE, an
individual; JOHN ROE, an individual;
BARBARA ROE, an individual;
PHOENIX HOTEL SF, LLC, a
California limited liability company;
FUNKY FUN, LLC, a California limited
liability company; and 2930 EL
CAMINO, LLC, a California limited
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**DECLARATION OF SAM PATEL IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

**ASSIGNED FOR ALL PURPOSES
TO THE HONORABLE DISTRICT
JUDGE JON S. TIGAR,
COURTROOM 6**

Action Filed: 03/14/2024
Trial Date: Unassigned

1 I, Sam Patel, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the facts stated
3 herein, except for facts that are stated on information, belief, or understanding. As to
4 the latter, I have a good faith basis for believing them to be true. I make this
5 declaration in support of Plaintiffs' Motion for Preliminary Injunction.


6 2. I am a member of 2930 El Camino, LLC, and oversee the day-to-day
7 operations of the Best Western Red Coach Inn at 700 Eddy Street, in the Tenderloin
8 district of San Francisco.

9 3. The Best Western is located within two blocks of 685 Ellis Street and
10 the COVA Hotel. I understand those locations have been operated as homeless
11 shelters by the City of San Francisco. The hotel is also located less than a block from
12 a former paraphernalia distribution site on Willow Street and a current
13 paraphernalia distribution site at the Glide Memorial Church parking lot.

14 4. The sidewalks on the block outside the hotel, and on Willow Street
15 behind the hotel, are frequently occupied by groups of people who appear to be
16 homeless drug users consuming narcotics. I see people who appear to be under the
17 influence of drugs standing, sitting, or lying down on the sidewalks. My employees
18 report to me that drug use occurs regularly around the hotel. Some of the homeless
19 people erect makeshift shelters on the sidewalk or Willow Street behind the hotel. I
20 also see lots of discarded items, such as garbage, syringes, needles, pipes, and
21 aluminum foil. My employees consistently try to clean up these hazards as quickly as
22 possible to keep hotel guests safe and maintain our hotel's reputation. However,
23 these conditions will be reported by guests in reviews, which I believe causes
24 prospective guests to avoid booking with us. There is noise from arguments and
25 yelling. There are offensive smells caused by smoke and human waste. These
26 activities and conditions disrupt the hotel's operations, my employees' work, and the
27 guests' use and enjoyment of the property.

28

14 I declare under penalty of perjury under the laws of the United States of
15 America that the foregoing is true and correct to the best of my knowledge.


Sam Patel